

IN RE: MARYLAND WILLIAMS, SR.  
ROSIE MAY WILLIAMS,

Debtors.

CASE NO: 15- 72070

CHAPTER : 13

**NOTICE AND MOTION TO APPROVE APPOINTMENT OF REPRESENTATIVE**

Maryland Williams, Sr. and Rosie May Williams, by Counsel, have filed paperwork to appoint their daughter, Juanita Williams as their representative in this instant Bankruptcy Case.

**Your rights may be affected. You should read these papers carefully and discuss them with your Attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult with one.)**

If you do not want the court to grant the relief sought in the motion, then on or before 7/16/2015, you or your attorney must: File with the court, at the address below, a written request for hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
Eastern District of Virginia  
Norfolk Division  
600 Granby Street  
Norfolk, VA 23510

You must also mail a copy to:

Hampton Roads Legal Services  
372 S. Independence Blvd. Suite 109  
Virginia Beach, VA 23452

Maryland Williams, Sr.  
Rosie May Williams  
924 Workwood Rd  
Norfolk, VA 23513

Juanita Williams  
924 Workwood Road  
Norfolk VA 23513

Edrie A. Pfeiffer VSB# 41791  
Hampton Roads Legal Services  
372 S. Independence Blvd. Suite 109  
Virginia Beach, VA 23452  
phone: (757) 340-3100  
admin@hamptonroadslegal.com

**MOTION TO APPROVE APPOINTMENT OF REPRESENTATIVE NUNC PRO TUNC**

COMES NOW Juanita Williams, on behalf of the Debtors, Maryland Williams, Sr. and Rosie May Williams, (hereinafter "Debtors"), by counsel and moves this court to enter an order Nunc Pro Tunc, appointing or substituting her as representative of the Debtors as an extraordinary step needed in order to administer the estate of Debtors, who are incompetent, as shown by their doctor's reports, (sent under separate cover to the Court rather than being attached to this motion, to protect the Debtors' privacy, but incorporated herein by reference as Exhibit A). This Motion is supported by Memorandum submitted contemporaneously herein.

**I. JURISDICTION.**

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1334(a).
2. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409(a).
3. This proceeding is filed pursuant to Federal Rules of Bankruptcy Procedure 1004-1, 1016, and 7017.

**II. BACKGROUND.**

1. The above Debtors filed a Chapter 13 Bankruptcy Petition on or about June 15, 2015 and an order granting relief was entered on the same date.

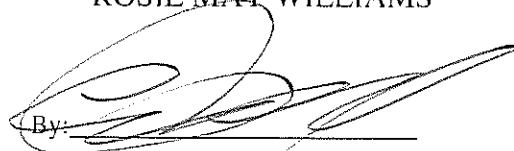
2. That Debtors are incompetent, as shown by their Doctor's reports (sent under separate cover to the Court, rather than being attached to this motion, to protect Mr. And Mrs. Williams's privacy, but incorporated herein by reference as Exhibit A).

3. That this Motion is support by the memorandum of Law submitted contemporaneously herein.

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WHEREFORE, the Debtors pray that this Court enter an Order appointing Juanita Williams as their representative Nunc Pro Tunc and not personally and that the Court allow this case to proceed and be concluded in the usual manner.

MARYLAND WILLIAMS, SR.  
ROSIE MAY WILLIAMS

By:   
Of Counsel

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Motion was electronically served upon the Chapter 13 Standing Trustee, and was mailed to: Juanita Williams, 924 Workwood Road Norfolk VA 23513, and Maryland and Rosie Williams, Sr. Williams, Sr., Debtors, 924 Workwood Rd Norfolk VA 23513 along with all creditors and parties in interest listed on the attached creditor matrix this 15<sup>th</sup> day of June, 2015.

  
Edrie A. Pfeiffer

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